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17 Development, Inc.

11 UNITED STATES BANKRUPTCY COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

15 In re:

16 PG&E CORPORATION

17 -and-

18 PACIFIC GAS AND ELECTRIC
19 COMPANY,

20 Debtors.

21 ☐ Affects PG&E Corporation
22 ☒ Affects Pacific Gas and Electric
23 Company
24 Affects both Debtors

25 * All papers shall be filed in the
26 Lead, Case, No. 19-30088 (DM).

Bankruptcy Case No. 19-30088 (DM)

Chapter 11 (Lead Case) (Jointly Administered)

**JOINDER OF CONSOLIDATED EDISON
TO NEXTERA ENERGY'S LIMITED
OPPOSITION TO (I) MOTION OF THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS FOR ENTRY OF A
PROTECTIVE ORDER; AND (II)
DEBTORS' MOTION FOR ENTRY OF
PROTECTIVE ORDER PURSUANT TO
FED. R. BANKR. P. 7026 AND 9014(c)
AND 11 U.S.C. § 105(a) GOVERNING
DISCOVERY MATERIALS AND OTHER
INFORMATION**

Date: June 26, 2019

Time: 9:30 a.m. (Pacific Time)

Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: June 19, 2019
4:00 p.m. (Pacific Time)

1 Consolidated Edison Development Inc. (“**Consolidated Edison**”) hereby joins (this
2 “**Joinder**”) in the limited opposition of NextEra Energy, Inc. and NextEra Energy Partners,
3 L.P. [Docket No. 2617] to the (a) *Motion of the Official Committee of Tort Claimants for*
4 *Entry of a Protective Order* [Docket No. 2419] and (b) *Motion for Entry of Protective Order*
5 *Pursuant to Fed. R. Bankr. P. 7026 and 9014(c) and 11 U.S.C. § 105(a) Governing Discovery*
6 *Materials and Other Information* [Docket No. 2459].

7 **NOTICE**

8 Notice of this Joinder will be provided to (i) the Office of the U.S. Trustee for Region
9 17 (Attn: Anthony R. Vara, Esq. and Timothy Laffredi, Esq.); (ii) counsel to the Debtors; (iii)
10 counsel to the Creditors Committee; (iv) counsel to the Tort Claimants Committee; (v) the
11 Securities and Exchange Commission; (vi) the Internal Revenue Service; (vii) the Office of
12 the California Attorney General; (viii) the California Public Utilities Commission; (ix) the
13 Nuclear Regulatory Commission; (x) the Federal Energy Regulatory Commission; (xi) the
14 Office of the United States Attorney for the Northern District of California; (xii) counsel for
15 the agent under the Debtors’ debtor-in-possession financing facility; (xiii) counsel to the PPA
16 Counterparties; and (xiv) those persons who have formally appeared in these chapter 11 cases
17 and requested service pursuant to Bankruptcy Rule 2002.

18 Consolidated Edison respectfully submits that no further notice is required.
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1 Dated: June 19, 2019
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TROUTMAN SANDERS LLP

4 By: /s/ Hugh M. McDonald

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